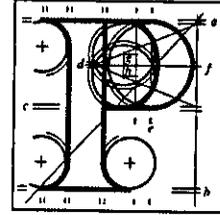


Our Case Number: ABP-314724-22



An  
Bord  
Pleanála

Michael Griffin  
C/O 26 Osprey Avenue  
Templeogue  
Dublin 6W

Date: 05 December 2022

Re: Railway (Metrolink - Estuary to Charlemont via Dublin Airport) Order [2022]  
Metrolink. Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont,  
Co. Dublin

Dear Sir / Madam,

An Bord Pleanála has received your recent submission (including your fee of €50) in relation to the above-mentioned proposed Railway Order and will take it into consideration in its determination of the matter.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions/observations received in relation to the application will be made available for public inspection at the offices of the relevant County Council(s) and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime, please contact the undersigned. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Niamh Thornton  
Executive Officer  
Direct Line: 01-8737247

Tell	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
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64 Sráid Macilbhríde	64 Marlborough Street
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WELLINGTON, WILLINGTON, WILDERWOOD, OSPREY, RUSHBROOK & KENNINGTON

workresidentsassociation@gmail.com

The Secretary,  
An Bord Pleanála,  
64, Marlborough Street,  
Dublin 1

AN BORD PLEANÁLA	
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Type:	Cheque
Time:	
By:	POST

c/o 26 Osprey Avenue  
Templeogue,  
Dublin 6W

17<sup>th</sup> November, 2022

Dear Sir / Madam

Case Reference NA29N.314724

**314724: Estuary through Swords, Dublin Airport, Ballymun, Glasnevin and City Centre to Charlemont, Co. Dublin.**

The following observation relates wholly to that portion of the proposed Metro Link beyond the station located at St. Stephen's Green East.

**Observations from WORK Residents' Association.**

WORK Residents' Association is fully supportive of the project from Estuary to St. Stephen's Green.

We submit that An Bord Pleanála should refuse the authorisation of the section of Metro Link beyond the St. Stephen's Green station, other than to allow for a turning section similar in length to that which is currently proposed for Manders Terrace.

Our reasons for this are as follows:

- (1) There has been a failure to consider an alternative location for the terminus in the Portobello / Rathmines area;
- (2) A terminus at Charlemont would present severe limitations for radial extensions towards many areas of south city;
- (3) Poor access to Charlemont from Rathmines / Portobello/ Harold's Cross
- (4) A terminus at Charlemont does nothing to relieve the continuation of the environmental damage caused by traffic gridlock and by a grossly inadequate public transport system for large areas of South West Dublin.

**1. Failure to consider an alternative location for the terminus.**

Under the *BusConnects* proposals Rathmines Road will carry 33 buses per hour at peak time in each direction. A terminus for Metro Link in the Rathmines Road / Portobello area would offer much greater bus connectivity and would connect areas of south west city that would be deprived of this connectivity by locating a terminus at Charlemont. A terminus at Rathmines / Portobello would better facilitate commuters on buses approaching the city via Kimmage Road Lower and Harold's Cross wishing to connect with Metro Link.

**2. Charlemont terminus – its limitations for radial extensions to other areas of the south city.**

Bringing Metro Link into south inner city (St. Stephen's Green station) presents opportunities for NTA, TII and the Minister with responsibility for transport to consider a location for a terminus that would render

optimum benefit to the commuters from many areas of south Dublin outside of the Grand Canal. The three options that have been put forward by various people including NTA Senior Executives, the Minister and many residents' representative groups, including WORK Residents' Association, centre around

- (a) Continuing Metro Link towards South West City and Tallaght,
- (b) Continuing on the existing Luas line,
- (c) Routing south east towards UCD and Sandyford.

WORK Residents' Association submits that locating the Metro Link terminus at Charlemont and boring a tunnel as far as Manders Terrace seriously compromises the ability for an extension at some future time to serve the many communities in Harold's Cross, Terenure, Kimmage, Crumlin, Perrystown, Greenhills, Willington, Orwell, Templeogue, Firhouse and Knocklyon.

WORK Residents' Association submits that proper planning for a major infrastructural project such as Metro Link requires a proper evaluation of the options for extension. Locating a terminus at Charlemont predetermines the issue and would not be consistent with proper planning.

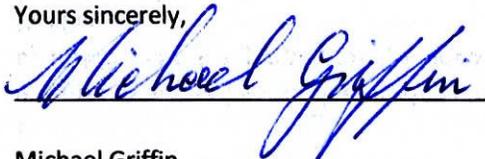
**3. Poor Access to Charlemont from Rathmines Road / Portobello / Harold's Cross**

No provision has been made in the plans for how commuters will get from Rathmines Road, Portobello or Harold's Cross to the proposed terminus at Charlemont. We reference Rathmines Road and Harold's Cross specifically as they are the major *BusConnects* corridors from South West Dublin (City and County). As Metro Link will provide a welcome transport link to Dublin Airport many of the commuters getting on /off Metro Link will carry luggage. Locating a Metro link station near major Bus Corridors would facilitate these commuters. We note from the documentation submitted as part of the application that *"while provision has been made for 162 cycle parking spaces most of which will be around the southern entrance with the remainder integrated with the urban design along the internal roads towards the northern entrance."* While provision for cycle parking is welcome at the proposed Metro Link terminus no such provision has been made to meet the needs of commuters to and from the airport who wish to access Metro Link.

**4. A terminus at Charlemont does nothing to relieve the continuation of the environmental damage caused by traffic gridlock and by a grossly inadequate public transport system for large areas of South West Dublin.**

A swathe of South West Dublin, ie. between the Green Luas Line and the Red Luas Line with a population of over 350,000, has a large deficit of public transport. WORK Residents Association does not believe that the planned supply of public transport to 2042 by *Bus Connects* will meet the forecast demand. The traffic gridlock, morning and afternoon, in Willington, Kimmage, Harold's Cross, Donore and on many narrow streets of south city continues with increased carbon emissions. Only Metro Link can deliver capacity and speed for the commuters in this area of South West Dublin. WORK Residents Association notes that in the context of the preparation of the Greater Dublin Area Transport Plan 2022 – 2042 The National Transport Authority carried out a feasibility study "Metro to Knocklyon". Unfortunately, the study failed to adequately assess the issue. Locating the terminus of Metro Link at Charlemont would compound the difficulties which were not addressed in that feasibility study. While WORK Residents' Association appreciates that An Bord Pleanála cannot mandate the conduct of a feasibility study we ask that An Bord Pleanála would not compound the difficulties by granting approval for the application for a terminus at Charlemont. To grant approval would render the continuation of Metro Link to S.W. Dublin at some future date very difficult if not prohibitive.

Yours sincerely,



Michael Griffin,  
Chairperson, WORK Residents' Association.